

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

DMITRY BANDURIN, *et al.*,

Plaintiffs

v.

AEROFLOT RUSSIAN AIRLINES, *et al.*,

Defendants.

Case No. 1:19-cv-00255

**DEFENDANT AEROFLOT RUSSIAN AIRLINES' MOTION TO DISMISS
PLAINTIFFS' SECOND AMENDED CLASS ACTION COMPLAINT**

Defendant Public Joint Stock Company «Aeroflot - Russian Airlines» (“Aeroflot”), incorrectly named herein as “Aeroflot Russian Airlines.” by and through its attorneys, moves this Court to dismiss this action against Aeroflot for lack of personal jurisdiction and for failure to state a claim pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure. To the extent the Second Amended Complaint is not dismissed in its entirety, Aeroflot moves the Court to dismiss and/or strike Plaintiffs’ class allegations to the extent the class definitions contain putative class members who would not be able to establish that their claims arise out of or relate to Aeroflot’s connections to the Illinois forum.

WHEREFORE, for the reasons stated above and set forth more fully in Aeroflot’s accompanying Memorandum in Support of this Motion and supporting Declaration of Oliver Beiersdorf, Defendant Public Joint Stock Company «Aeroflot - Russian Airlines» (“Aeroflot”), incorrectly named herein as “Aeroflot Russian Airlines,” respectfully requests that this Court enter an order (1) granting Aeroflot’s Motion to Dismiss; (2) dismissing all of Plaintiffs’ claims against Aeroflot

with prejudice; (3) entering final judgment in favor of Aeroflot and against Plaintiffs; and (4) granting such other and further relief as the Court deems just and proper.

Dated: April 26, 2019

Respectfully submitted,

AEROFLOT RUSSIAN AIRLINES

By: /s/ Karlin E. Sangdahl

Karlin E. Sangdahl
REED SMITH LLP
10 S. Wacker Drive, Suite 4000
Chicago, IL 60606
(312) 207-1000
ksangdahl@reedsmith.com

Oliver Beiersdorf (*pro hac vice* forthcoming)
REED SMITH LLP
599 Lexington Avenue, 22nd Floor
New York, NY 10022
(212) 521-5400
obeiersdorf@reedsmith.com

Attorneys for Defendant Aeroflot Russian Airlines

CERTIFICATE OF SERVICE

I, Karlin E. Sangdahl, an attorney, state that on April 26, 2019, I electronically filed the foregoing *Motion to Dismiss Plaintiffs' Second Amended Class Action Complaint* with the Clerk of the Court using the ECF system which will send notification to all parties.

/s/ Karlin E. Sangdahl